

ORIGINAL



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III

841 Chestnut Building
Philadelphia, Pennsylvania 19107



SDMS DocID 2236940

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

In Reply Refer to: 3HW14

APR 12 1988

Zurn Oil
John Ballinger
2736 North Broad Street
Philadelphia, PA 19132

Re: Metro Container Corporation Site

Dear John Ballinger:

The U.S. Environmental Protection Agency ("EPA") is seeking information concerning a release, or the threat of a release, of hazardous substances into the environment. Pursuant to the authority of Section 3007(a) of the Resource Conservation and Recovery Act ("RCRA"), 42 U.S.C. Section 6927(a), and Section 104(e) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 ("CERCLA"), 42 U.S.C. Section 9604(e), as amended by the Superfund Amendments and Reauthorization Act of 1986 ("SARA"), you are requested to furnish all information and documents in Zurn Oil's possession, custody, or control, or in the possession, custody, or control of any of Zurn Oil's officers, employees or agents which concern, refer, or relate to hazardous substances as defined by Section 101(14) of CERCLA, 42 U.S.C. Section 9601(14), including but not limited to empty unwashed 55 gallon drums or other containers which Zurn Oil generated, transported, disposed of, or arranged for transportation or disposal of at the Metro Container Corporation or Metro Enterprises Container Corporation or Universal Container Corporation at Second and Price Streets, Trainer, PA 19013 (the "Site").

All information and documents requested are due to the address listed below within ten (10) calendar days of receipt of this letter.

*Rec'd 4/27/88
Certified Mail
P. 728 331/83*

The response should include, but not be limited to, information and documentation concerning:

1. The types and quantities of the hazardous substances generated or transported by Zurn Oil and sent to, transported to, or disposed of at the Site;
2. the quantities and residual contents of unwashed 55 gallon drums or containers which Zurn Oil generated or transported and which were sent to, transported to, or disposed of at the Site, whether or not they contained hazardous substances;
3. the date(s) such substances and/or containers were sent to, transported to, or disposed of at the Site;
4. any correspondence between Zurn Oil and any regulatory agencies regarding such substances and/or containers;
5. any correspondence between Zurn Oil and Metro Container Corporation, Metro Enterprise Container Corporation, or Universal Container Corporation or any other third party regarding such substances and/or containers;
6. the identity of, and documents relating to, any other persons who generated, treated, stored, transported, or disposed, or who arranged for the treatment, storage, disposal, or transportation of such substances and/or containers to the Site;
7. copies of any deeds, rights-of-way, leases, or other real interests which Zurn Oil has or had in the Site; and
8. whether the substances or containers described above were sent to or transported to the Site for disposal, or reconditioning and return, or reconditioning and resale by Metro Container Corporation or Metro Enterprise Container Corporation or Universal Container Corporation.

Please describe any documents that were maintained by Zurn Oil of the transactions with Metro Container Corporation or Metro Enterprise Container Corporation or Universal Container Corporation, including the date of the documents, the author of the documents, the current location of the documents and the current custodian, and all efforts that were taken to identify these documents.

In addition to the above information, if your company is privately insured against releases of hazardous wastes or substances as a result of the handling of such materials, please inform us of the existence of such insurance and provide us with copies of all relevant insurance policies.

As used herein, the term "documents" means writings (handwritten, typed or otherwise produced or reproduced) and includes, but is not limited to, any invoices, checks, receipts, bills of lading, weight receipts, toll receipts, correspondence, offers, contracts, agreements, deeds, leases, manifests, licenses, permits, bids, proposals, policies of insurance, logs, books of original entry, minutes of meetings, memoranda, notes, calendar or diary entries, agendas, bulletins, notices, announcements, charts, maps, photographs, drawings, manuals, brochures, reports of scientific study or investigation, schedules, price lists, telegrams, teletypes, phono-records, magnetic voice or video records, tapes, summaries, magnetic tapes, punch cards, recordings, discs, computer printouts, or other data compilations from which information can be obtained or translated.

You are entitled to assert a claim of business confidentiality covering all or part of the submitted information, in the manner described in 40 C.F.R. Section 2.203(b). Information subject to a claim of business confidentiality will be made available to the public only in accordance with the procedures set forth in 40 C.F.R. Part 2, Subpart B. Unless a business confidentiality claim is asserted at the time the requested information is submitted, EPA may make this information available to the public without further notice to you.

Please send the required information to:

Lawrence Falkin
U.S. Environmental Protection Agency, Region III
CERCLA Removal Enforcement Section (3HW14)
841 Chestnut Building, 6th Floor
Philadelphia, PA 19107

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. Section 3501, et seq.

If you have any questions concerning this matter, please contact Lawrence Falkin at (215) 597-6679.

Sincerely,

for Neil R. Swanson
Bruce P. Smith, Chief
Hazardous Waste Enforcement Branch